

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

COLE'S WEXFORD HOTEL, INC.,)	
on its own behalf and on behalf of all)	
others similarly situated,)	Case No. 2:10-cv-01609-JFC
)	
Plaintiffs,)	Judge Joy Flowers Conti
)	
v.)	
)	
UPMC and)	
HIGHMARK, INC.,)	
)	
Defendants.)	
)	
)	

**PLAINTIFF'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND FOR
REIMBURSEMENT OF EXPENSES, AND FOR SERVICE PAYMENT TO CLASS
REPRESENTATIVE**

Plaintiff class representative, Cole's Wexford Hotel, Inc. ("Plaintiff"), through its undersigned respective counsel ("Settlement Class Counsel"), upon the accompanying brief filed this same day and all supporting exhibits, respectfully move this Court for entry of an Order, in the form attached hereto, approving: (i) an award of attorneys' fees and expenses in the amount of 30% of the Settlement Fund to Settlement Class Counsel, and (ii) a service payment to Plaintiff in the amount of \$7,500.00, payable from the Settlement Fund.

Dated: May 6, 2016

/s/ Patrick K. Cavanaugh

Arthur H. Stroyd, Jr. (Pa. No. 15910)
Steven J. Del Sole (Pa. No. 73460)
Patrick K. Cavanaugh (Pa. No. 72960)
DEL SOLE CAVANAUGH STROYD
LLC
3 PPG Place, Suite 600
Pittsburgh, PA 15222
Tel: 412-261-2393
Fax: 412-261-2110
astroyd@dscslaw.com
sdelsole@dscslaw.com
pcavanaugh@dscslaw.com

Andrew M. Stone (Pa. No. 35176)
STONE LAW FIRM, LLC
The Frick Building, Suite 1806
437 Grant Street
Pittsburgh, PA 15219
Tel: 412-391-2005
Fax: 412-391-0853
astone@stone-law-firm.com

Scott M. Hare (Pa. No. 63818)
The Frick Building, Suite 1806
437 Grant Street
Pittsburgh, PA 15219
Tel: 412-338-8632
Fax: 412-338-6611
scott@scottlawpgh.com

Respectfully Submitted,

/s/ Hamish Hume

Hamish Hume (*pro hac vice*)
Melissa Felder Zappala (*pro hac vice*)
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Avenue, N.W.
Washington, D.C. 20015
Tel: 202-237-2727
Fax: 202-237-6131
hhume@bsfllp.com
mzappala@bsfllp.com

David Stone (*pro hac vice*)

STONE & MAGNANINI LLP
100 Connell Drive, Suite 2200
Berkeley Heights, NJ 07922
Tel: 973-218-1111
Fax: 973-218-1106
dstone@stonemagnalaw.com